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ADMITTED NY

April 24, 2024

By ECF


The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 15C
New York, New York 10007

REQUEST GRANTED.

The Evidentiary hearing scheduled for April 29, 2024 and the filing of motions in limine are adjourned sine die. A Change of Plea hearing will be held on May 15, 2024 at 3:30PM in Courtroom 15C at the 500 Pearl Street Courthouse.

4/25/2024 SO ORDERED.

Re: *United States v. Siegel*, 23 Cr. 207 (LJL)


LEWIS J. LIMAN
United States District Judge

Your Honor:

Gilbert Bayonne and I represent defendant Danielle Siegel in the above-referenced case. I write to request that: 1) a plea hearing be scheduled in this case as the parties have reached a plea agreement, *see* attached Plea Agreement; 2) the April 29, 2024 evidentiary hearing and May 6, 2024 date for the filing of the parties' *motions in limine* be adjourned *sine die*; and 3) that the plea hearing be scheduled for after May 7, 2024 for Ms. Siegel to travel to the district from Texas as she was recently seriously injured and has movement restrictions. *See* attached medical records of multiple fractures. The parties have conferred and we are available the week of May 13, 2024, except for May 16, 2024, for an in-person plea.

In the alternative, if the Court wishes the hearing to proceed earlier, I would ask that Ms. Siegel be permitted to appear virtually on May 1, 2, 3, or 7, 2024, but not on April 29, 2024 because yesterday, a sentencing I had scheduled for this Friday in the Eastern District of New York was adjourned by the Court to April 29, 2024 in *United States v. Agoro, et al.*, 20 Cr. 293, and I need to confer with my client that morning.

The government does not consent to Ms. Siegel appearing virtually as the CARES Act has expired.

We appreciate the Court's consideration of this application.

Respectfully,

/s/ Michael Hueston

Enc.

Cc: Counsel of Record